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ATTORNEY FOR PLAINTIFF

UNITED STATES DISTRICT COURT
FOR THE NORTHERN DISTRICT OF CALIFORNIA

FRED LEWIS, individually and on behalf of
all others similarly situated,

Plaintiff,

v.

RJM ACQUISITIONS LLC,

Defendant.

Case No.: C 08-02297 MMC

CLASS ACTION

**COMPLAINT TO RECOVER DAMAGES
FOR UNLAWFUL DEBT COLLECTION
PRACTICES**

JURY DEMAND

I. PRELIMINARY STATEMENT

1. This is a consumer class action based upon Defendant's violation of the Fair Debt Collection Practices Act, 15 U.S.C. § 1692, *et seq.* ("FDCPA"). The Act prohibits debt collectors from engaging in deceptive and unfair collection practices. The Act also imposes on the debt collector a duty to effectively communicate to consumers their right to dispute the debt and obtain verification of the debt. In the Ninth Circuit, the impact of language used by debt collectors is judged from the perspective of the least sophisticated debtor in our society. *Swanson v. Southern Oregon Credit Services, Inc.*, 869 F.2d 1222, 1225 (9th Cir. 1988).

II. JURISDICTION AND VENUE

2. Jurisdiction of this Court arises under 15 U.S.C. § 1692k(d), 28 U.S.C. §§ 1331 & 1337.

3. Venue lies in this district pursuant to 28 U.S.C. § 1391(b).

III. PARTIES

4. Plaintiff, FRED LEWIS (“Mr. Lewis”), is an adult male citizen of the state of California who resides at 5360 Fulton Street, San Francisco, California.

5. Defendant, RJM ACQUISITIONS LLC (“RJM”), is a business entity engaged in debt collection that has a principal place of business located at 575 Underhill Blvd., Suite 224, Syosset, NY 11791-3411.

IV. FACTUAL ALLEGATIONS

6. Some time ago, Mr. Lewis incurred a debt on an HSBC Gold Mastercard for the purchase of goods and services for his personal needs.

7. Mr. Lewis was unable to pay the credit card debt.

8. Sometime thereafter, Defendant RJM bought Plaintiff’s debt, and thousands of other debts like Plaintiff’s debt, for pennies on the dollar, from HSBC and others.

9. Sometime after January 14, 2008, Mr. Lewis received from Defendant RJM the attached two-sided letter, Exhibits A and B, with the greeting, in bold capital letters:

WELCOME, FRED D. LEWIS, TO RJM’S GIFT/REWARD PROGRAM.

The letter was accompanied by a booklet entitled, “Gift Reward Catalog,” Exhibit C.

10 The letter, Exhibits A and B, was the initial letter received by Plaintiff from Defendant.

11. The initial letter was a form letter, as shown by the form number at the lower right of Exhibit A.

12. The initial letter to a debtor must carry the debtor’s validation rights as mandated by 15 U.S.C. § 1692g, and those rights must not be overshadowed or confused by other messages.

13. Defendant’s letter, Exhibits A and B, violates 15 U.S.C. § 1692g, as Defendant fails to effectively provide the required validation notice.

14. The validation rights must be effectively conveyed, as viewed from the eyes of the least sophisticated debtor. The Ninth Circuit has stated:

The statute is not satisfied merely by inclusion of the required debt validation notice; the notice Congress required must be conveyed effectively to the debtor. It must be large enough to be easily read and sufficiently prominent to be noticed—even by the least sophisticated debtor. *Baker*, 677 F.2d at 778. Furthermore, to be effective, the notice must not be overshadowed or contradicted by other messages or notices appearing in the initial communication from the collection agency. [Emphasis added.]

Swanson v. Southern Oregon Credit Services, 869 F.2d 1222, 1225 (9th Cir. 1988).

15. The Defendant's letter, Exhibits A and B, and its accompanying Gift Reward Catalog, does not meet this Ninth Circuit standard.

16. The two-sided letter, with its accompanying Gifts Reward Catalog ("the Package") denied Plaintiff his rights under 15 U.S.C. § 1692g in the following manner:

A. The Package would be discarded, unread, as its appearance is that of junk mail.

B. The introduction at Exhibit A reading, "Welcome, Fred Lewis, to RJM's Gift/Reward Program" overshadows and contradicts the validation notice placed on the reverse side of Exhibit A, i.e., Exhibit B.

C. The references on Exhibit A to "opportunities" is false, deceptive, and misleading, as the items referred to are merely settlement offers which overshadow the validation notice on the reverse of the letter, Exhibit B.

D. The notice that the communication is from a debt collector is insignificant in size relative to the "opportunities" featured in bold, black, bordered type.

E. The credit card inducement at the lower right of Exhibit A is typical of junk mail.

F. The collection letter, Exhibit A, fails to refer Plaintiff to the reverse side of the letter, Exhibit B, that states the Plaintiff's validation rights.

17. Defendant's letter to the Plaintiff fails to meet the rule of law requiring the debt validation notice to be effectively conveyed to the debtor.

18. At all times relevant hereto, Plaintiff was a "consumer" as that term is defined by 15 U.S.C. § 1692a(3).

19. At all times relevant hereto, Defendant was acting by and through its agents, servants and/or employees, who were acting within the course and scope of their agency or

1 employment, and under the direct supervision and control of Defendant.

2 20. At all times relevant hereto, the unlawful conduct of the Defendant, as well as that
3 of its agents, servants and/or employees, did not result from an isolated or solitary instance of
4 human error, but rather was willful, intentional, in reckless disregard of the FDCPA, and
5 consistent with Defendant's corporate policy.

6 **V. CLASS ALLEGATIONS**

7 21. Plaintiff brings this action individually and as a class action, pursuant to Rules
8 23(a) and 23(b) of the Federal Rules of Civil Procedure, on behalf of the following Class: All
9 persons in the State of California during the one-year period prior to the filing of this Complaint
10 and up through the time of judgment of this action who: (a) received the two-sided letter attached
11 hereto as Exhibits A and B and the Gift Reward Catalog.

12 22. The Class is so numerous that joinder of all members is impracticable. Although
13 the precise number of Class members is known only to Defendant, Plaintiff avers upon
14 information and belief that the Class numbers is in the thousands.

15 23. There are questions of law and fact common to the Class that predominate over
16 any questions affecting only individual Class members. The principal question is whether the
17 Defendant violated the FDCPA by sending a collection letter that failed to explicitly state the
18 debtor's validation rights and made false, deceptive, and misleading representations regarding
19 "Gift/Reward Program" as a device to collect the debts it purchased for pennies on the dollar.

20 24. Plaintiff's claims are typical of the claims of the Class, which all arise from the
21 same operative facts and are based on the same legal theories.

22 25. Plaintiff will fairly and adequately protect the interests of the Class. Plaintiff is
23 committed to vigorously litigating this matter. Further, Plaintiff has retained counsel highly
24 experienced in class action litigation to prosecute his claims and those of the Class.

25 26. This action should be maintained as a class action because the prosecution of
26 separate actions by individual members of the Class would create a risk of inconsistent or
27 varying adjudications with respect to individual members which would establish incompatible
28 standards of conduct for the parties opposing the Class, as well as a risk of adjudications with

1 respect to individual members which would as a practical matter be dispositive of the interests of
 2 other members not parties to the adjudications or substantially impair or impede their ability to
 3 protect their interests.

4 27. Defendant has acted or refused to act on grounds generally applicable to the Class,
 5 thereby making appropriate final injunctive relief or corresponding declaratory relief with respect
 6 to the Class as a whole.

7 28. A class action is a superior method for the fair and efficient adjudication of this
 8 controversy. The interest of Class members in individually controlling the prosecution of
 9 separate claims against Defendant is small as the maximum statutory damages are limited to
 10 \$1,000.00 under the FDCPA. Management of the Class claims is likely to present significantly
 11 fewer difficulties than those presented in many individual claims. The identities of the Class
 12 members may be obtained from Defendant's records.

13 **VI. CLAIM FOR RELIEF** 14 (Violation of the FDCPA)

15 29. Plaintiff incorporates the foregoing paragraphs as though the same were set forth
 16 at length herein.

17 30. Pursuant to 15 U.S.C. § 1692k, Defendant is liable for violating the FDCPA by
 18 engaging in the following conduct:

19 A. using false, deceptive, and misleading representations regarding the
 20 purpose of the communications, Exhibits A and B.

21 B. failing to provide the least sophisticated consumer with an effective
 22 validation notice as required by 15 U.S.C. § 1692g.

23 31. Due to Defendant's violation of the FDCPA, Plaintiff and the Class are entitled to
 24 statutory damages in the amount of the lesser of \$500,000 or 1% of the Defendant's net worth.

25 **VII. JURY TRIAL DEMAND**

26 32. Plaintiff demands trial by jury on all issues so triable.

27 **VIII. PRAYER FOR RELIEF**

28 WHEREFORE, Plaintiff seeks judgment in favor of himself and the Class for the
 following:

1 A. Statutory damages in the amount of the lesser of \$500,000 or 1% of Defendant's
2 net worth;

3 B. Costs and reasonable attorneys' fees pursuant to section 15 U.S.C. § 1692k(a)(3)
4 of the FDCPA.

5 C. Such other and further relief as may be necessary, just and proper.
6

7 Dated: 5-01-08

/s/

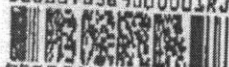
8 Irving L. Berg
9 THE BERG LAW GROUP
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 Corte Madera, California 94925
 (415) 924-0742
 (415) 891-8208 (Fax)

11 ATTORNEY FOR PLAINTIFF
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EXHIBIT A

RJM Acquisitions LLC
PO Box 18006
Hauppauge, NY 11788-8806
100887856 9000001 RJM062011408

499 628 00088904 A
507340

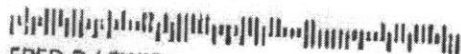


PERSONAL & CONFIDENTIAL

RJM Acquisitions LLC
575 Underhill Blvd. Suite 224
Syosset, NY 11791-3416
(516) 714-1300
Fax No. (516) 714-1310
Thurs 8am-7pm, Fri 8am-3pm

January 14, 2008

RECEIVED 1-24-08
[Signature]



FRED D LEWIS
5360 FULTON ST
SAN FRANCISCO CA 94121-3534

For Payments or Inquiries Only
Call Toll-Free (800) 491-2933
RJM File # 1008878569

OG2 000 001

WELCOME, FRED D LEWIS, TO RJM'S GIFT/REWARD PROGRAM

Original/Previous creditor † HSBC GOLD MASTERCARD
Account # † 5215077335009641
RJM file number † 1008878569
Balance due † \$5,345.95
Social Security Number † 56-**-**12

As you recall, RJM Acquisitions LLC ("RJM") has purchased the above referenced account. As required by law, we are informing you that we have submitted negative information regarding this account to Trans-Union and Experian.

We would like to extend to you the following 3 opportunities.

OPPORTUNITY #1



Sony Notebook Computer 160GB HD From The Maple Collection

SETTLE THIS ACCOUNT FOR \$4,276.76 AND RECEIVE A GIFT FROM RJM

RJM would like to offer you a settlement of \$4,276.76, a savings of \$1,069.19 off the balance due of \$5,345.95, AND a valuable gift!

Here is how RJM's Gift/Reward Program works:

- † Select a gift from the Maple Collection and complete the tear-off section below (see the enclosed gift/reward catalog for a sampling of gift choices, or log onto www.total-awards.com/RJM to view all gift choices in the Maple Collection).
 - And
 - † Send us your first monthly payment of \$100.00 towards the settlement balance of \$4,276.76.
 - † After you send us a total of \$4,276.76 in accordance with this offer, your account will be Satisfied in Full, and the gift you selected will be shipped to you, free of charge* (Shipping, handling and taxes are also paid by RJM).
- *All gift items are shipped brand new, factory packed and sealed, and come with all manufacturers warranties.

OPPORTUNITY #2

SETTLE THIS ACCOUNT FOR \$3,207.57 (A 40% OFF DISCOUNT) PAYABLE AT \$50.00 PER MONTH

If Opportunity #1 does not interest you, RJM would like to offer you a settlement of \$3,207.57, a 40% discount (off the balance due of \$5,345.95), to be paid in monthly payments of \$50.00.

OPPORTUNITY #3

PAY ONLY \$25.00 PER MONTH MONTHLY PAYMENT OF

\$25.00

LOWEST MONTHLY
PAYMENT

If you cannot take advantage of Opportunity #1 or #2, RJM is pleased to accept \$25.00 per month until the balance due of \$5,345.95 is paid.

Please respond by February 28, 2008. Upon completion of any of the above offers, your account will be Satisfied in Full.

This communication is from a debt collector and is an attempt to collect a debt. Any information obtained will be used for that purpose. Please see important information on reverse side.

*If the partial social security number listed above does not match your social security number, please contact this office.

* Details Here *

Name: FRED D LEWIS

Yes, I would like to take advantage of:

☐ OPPORTUNITY #1:

† Details Here †
RJM File Number: 1008878569
Gift Collection: Maple Collection



010 NO. 974

COLOUR DROP → 8918208

13:33

05/06/2008

OG2 000 001

WELCOME, FRED LEWIS, TO RJM'S GIFT/REWARD PROGRAM

Original/Previous creditor † HSBC GOLD MASTERCARD
 Account # † 5215077335009641
 RJM file number † 1008878569
 Balance due † \$5,345.95
 Social Security Number † 56*-***123

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 - And
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 MONTHLY PAYMENT OF**

\$25.00

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This communication is from a debt collector and is an attempt to collect a debt. Any information obtained will be used for that purpose. Please see important information on reverse side.

*If the partial social security number listed above does not match your social security number, please contact this office.

* Detach Here *

Name: FRED D LEWIS

* Detach Here *

Yes, I would like to take advantage of:

☐ **OPPORTUNITY #1**

Enclosed is my first payment of \$100.00 towards the settlement balance of \$4,276.76. Please ship the gift I have selected after I complete this offer. Please send me a receipt.

Name of Gift/Description _____

Gift # _____

☐ **OPPORTUNITY #2**

Enclosed is my first payment of \$50.00 towards the settlement balance of \$3,207.57 (a 40% off discount). Please send me a receipt.

☐ **OPPORTUNITY #3**

Enclosed is my first payment of \$25.00 towards the balance due of \$5,345.95. Please send me a receipt.

☐ Other _____

RJM File Number: 100887856
 Gift Collection: Maple Collection



PLEASE COMPLETE THIS SECTION ONLY IF PAYING BY CREDIT CARD



☐

☐

☐

Card No. _____

Expiration Date: _____ Amount: _____

Cardholder Name: _____

Signature: _____ Date: _____

By selecting the credit card option, you are entering into a new loan agreement with RJM Acquisitions LLC replacing any other agreement with regard to this account.

EXHIBIT B

**IMPORTANT INFORMATION ABOUT YOUR DEBT**

We are required under certain applicable laws to notify consumers of the following rights. This list does not contain a complete list of the rights consumers have under federal and state law.

If this is the first communication you have received from us regarding this debt, please be aware that this communication is from a debt collector, and it and others from us are an attempt to collect a debt. Any information obtained will be used for that purpose. This debt is owed to RJM Acquisitions LLC. Unless you dispute the validity of all or part of this debt within 30 days after receipt of this notice, we will assume the debt is valid. If you notify us in writing within the 30-day period, we will mail a copy of verification of the debt or the judgment to you and will provide you with the name and address of the original creditor for this debt.

Your acceptance of the offer(s) described on the reverse side of this letter prior to the expiration of the 30-day period for dispute described above will not extinguish your right to dispute all or part of the original debt. All disputes within the 30-day dispute period will be honored.

The state of California requires that we disclose the following for California Residents: The state Rosenthal Fair Debt Collection Practices Act and the federal Fair Debt Collection Practices Act require that, except under unusual circumstances, collectors may not contact you before 8 a.m. or after 9 p.m. They may not harass you by using threats of violence or arrest or by using obscene language. Collectors may not use false or misleading statements or call you at work if they know or have reason to know that you may not receive personal calls at work. For the most part, collectors may not tell another person, other than your attorney or spouse, about your debt. Collectors may contact another person to confirm your location or enforce a judgment. For more information about debt collection activities, you may contact the Federal Trade Commission at 1-877-FTC-HELP or www.ftc.gov.

The state of Colorado requires that we disclose the following for Colorado Residents: For information about the Colorado Fair Debt Collection Practices Act, see www.ago.state.co.us/cadc/cadcmain.cfm.

The commonwealth of Massachusetts requires that we disclose the following for Massachusetts Residents: You have the right to make a written or oral request that telephone calls regarding your debt not be made to you at your place of employment. Any such oral request will be valid for only ten days unless you provide written confirmation of the request postmarked or delivered within seven days of such request. You may terminate this request by writing to the collection agency.

The state of North Carolina requires that we disclose the following for North Carolina Residents: RJM Acquisitions LLC is licensed by the North Carolina Department of Insurance under permit number 3952.

New York City: License number 1250735.

If you are entitled to the protections of the United States Bankruptcy Code (11 U.S.C. §§ 362;524) regarding the subject matter of this communication, the following applies to you: THIS COMMUNICATION IS NOT AN ATTEMPT TO COLLECT, ASSESS, OR RECOVER A CLAIM IN VIOLATION OF THE BANKRUPTCY CODE AND IS FOR INFORMATIONAL PURPOSES ONLY.

00085964 A

New Address? Has anything changed?

If yes, check box ☐ and make changes below.

New Address

05/06/2008 13:33 COLOUR DROP → 89182828

From NO.974 P13

...and will provide you with the name and address of the original creditor for this debt.

Your acceptance of the offer(s) described on the reverse side of this letter prior to the expiration of the 30-day period for dispute described above will not extinguish your right to dispute all or part of the original debt. All disputes within the 30-day dispute period will be honored.

The state of California requires that we disclose the following for California Residents: The state Rosenthal Fair Debt Collection Practices Act and the federal Fair Debt Collection Practices Act require that, except under unusual circumstances, collectors may not contact you before 8 a.m. or after 9 p.m. They may not harass you by using threats of violence or arrest or by using obscene language. Collectors may not use false or misleading statements or call you at work if they know or have reason to know that you may not receive personal calls at work. For the most part, collectors may not tell another person, other than your attorney or spouse, about your debt. Collectors may contact another person to confirm your location or enforce a judgment. For more information about debt collection activities, you may contact the Federal Trade Commission at 1-877-FTC-HELP or www.ftc.gov.

The state of Colorado requires that we disclose the following for Colorado Residents: For information about the Colorado Fair Debt Collection Practices Act, see www.ago.state.co.us/cadc/cadmain.cfm.

The commonwealth of Massachusetts requires that we disclose the following for Massachusetts Residents: You have the right to make a written or oral request that telephone calls regarding your debt not be made to you at your place of employment. Any such oral request will be valid for only ten days unless you provide written confirmation of the request postmarked or delivered within seven days of such request. You may terminate this request by writing to the collection agency.

The state of North Carolina requires that we disclose the following for North Carolina Residents: RJM Acquisitions LLC is licensed by the North Carolina Department of Insurance under permit number 3952.

New York City: License number 1250735.

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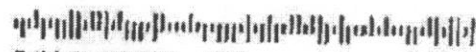
00085954 A

From	
Street	
City	Zip

New Address? Has anything changed?		
If yes, check box <input type="checkbox"/> and make changes below.		
New Address: _____		
City	State	Zip
New Name: _____		
Phone Number: _____		

RJM File # 1008878569
Re: FRED D LEWIS
Gift Collection: Maple Collection

- ✓ Make your check or money order payable to RJM Acquisitions LLC.
- ✓ Be sure the address to the right appears in the return envelope window.
- ✓ Write your RJM File # on your payment or


RJM Acquisitions LLC
575 Underhill Blvd. Suite 224
Syosset, NY 11791-9827

NO. 974 014

05/06/2008 13:33
COLOUR DROP + 89182208
100 000
0602

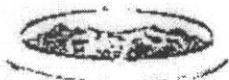
EXHIBIT C

RJM
ACQUISITIONS

Gift Reward Catalog

Please visit our website at www.total-awards.com/rjm to view this complete catalog

Birch COLLECTION



B-01250018

Proctor-Silex® 1.5-qt Slow Cooker

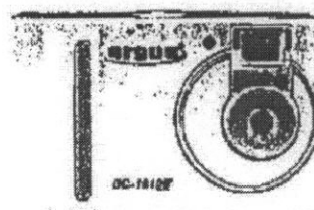
Convenient dishwasher safe removable crock and glass lid. Also features keep warm setting.



B-05140054

Sony® Black AM/FM Clock Radio

Loaded with convenient features such as automatic time set, automatic daylight savings time adjustment, built in calendar, and battery backup with installed lithium battery. Highly visible 8.9-in green LED. AM/FM analog tuner and extendable snooze.

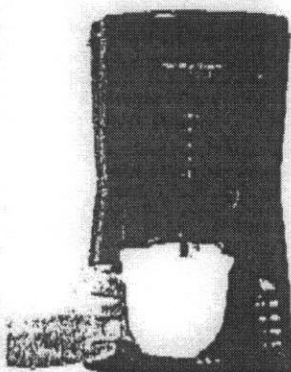


B-02050041

Argus® VGA Digital Camera

Provides point and shoot simplicity. 2Mba internal memory, status LCD, and webcam functionality. Includes ArtSoft PhotoImpression software and batteries.

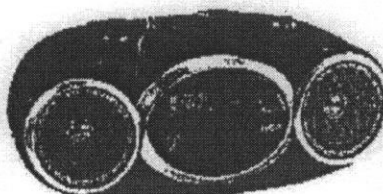
Dogwood COLLECTION



D-01050008

Hamilton Beach® Black Brew Station Coffeemaker

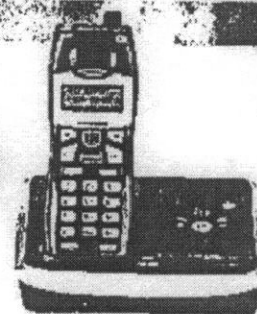
One-hand dispensing with no carafe, no pouring, and no spills. Coffee stays fresher longer. 2-hour automatic shutoff. Holds ten cups.



D-05060056

RCA® Portable CD with AM/FM Stereo

Front load CD player with AM/FM stereo tuner and storage area for MP3 player with line in. Place your MP3 player into the storage area, plug it into the audio input jack, and play your MP3.



D-23040025

G.E.® 5.8GHz Phone/ Digital Answering System

Digital answering system stores messages in memory. Remote message retrieval allows access to messages when away from home. Bilingual capability, handset volume control, and backlit LCD.

Freesia COLLECTION



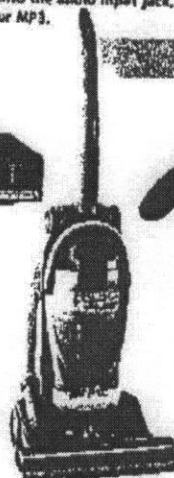
F-05090350

Sony® Single Tray Black DVD Player

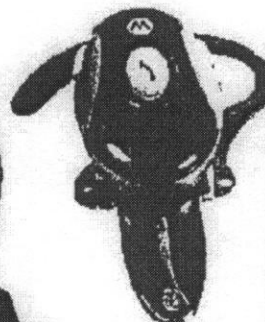
Versatile progressive scan DVD player with Precision Drive™ 3 system, Dolby® Digital Decoding compatible, multi-disc resume, and HDMI output.

Hoover® Fold Away Widepath Bagless Upright

Powerful 12-amp motor with easy-empty dirt cup, on-board tool set, and allergen filtration. 15-in cleaner width.



F-01320014

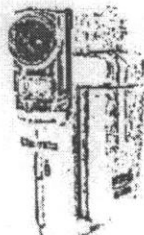


F-05140062

Motorola® H700 Bluetooth Headset

Wireless connection to compatible phone up to 30 feet with proven 50+ generation technology. Folding microphone design in a very compact package. Offers up to 6 hours talk / 130 hour standby time and features advanced volume controls, multi-function button, and status LED.

THIS COMMUNICATION IS FROM A DEBT COLLECTOR AND IS AN ATTEMPT TO COLLECT A DEBT. ANY INFORMATION OBTAINED WILL BE USED FOR THAT PURPOSE.

RJM**Geranium COLLECTION**

G-02050077

Argus® Digital Video Camera

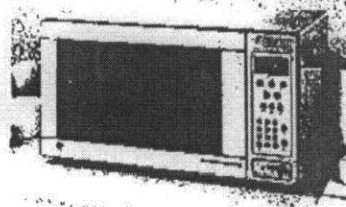
A versatile camera featuring 8x picture/4x video zoom, 1.5-in LTPS display, 64Mb NAND flash internal memory, and SD card slot. 3.2 Mp still image capture and 30-4ps video recording plus high-quality voice recording. USB connectivity plus webcam functionality. Includes photo editing software.



G-05110006

Audiovox® 300W DVD Home Theater System

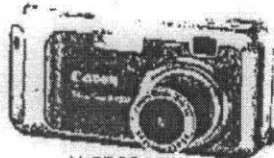
Includes a progressive scan DVD player, AM/FM tuner, and 5 magnetic shield surround speakers plus subwoofer. Built-in Dolby® Digital 5.1. Includes remote control.



G-01200003

G.E.® Stainless 1.1 cu ft 1100W Microwave

Convenient cooking controls, auto and time defrost, turntable, child lockout, and kitchen timer.

Hickory COLLECTION

H-02050016

Canon® PowerShot® A460 5 MP Digital Camera

High-quality Canon 4x optical zoom and 2.0-in LCD screen, DIGIC II image processor, ISAPS technology, and PictBridge compatible.



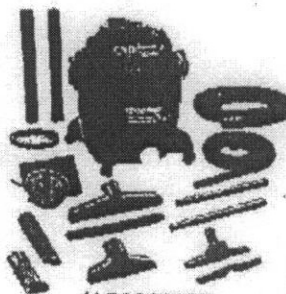
H-03020073

Seiko® Oak Pendulum Wall Clock

Dark brown solid oak with banjo pendulum, glass crystal, volume control, and night time silencer. Plays Westminster/Whittington chimes. Operates on 1 C battery (included).

Shop-Vac® 10-gallon Ultra Wet/Dry Vac with Blower

Includes attachments and accessories plus detachable blower. 6.5-hp motor.



H-Z6180005

Iris COLLECTION

I-05190218

Hoover® SteamVac with CleanSurge™

12 amp power with dual tank design, SpinScrub™ multiple brush system, heated cleaning, SpinScrub™ powered hand tool, and 24-ft cord.



I-05060055

Apple® iPod® Nano 8Gb Silver Digital Music Player

iPod® Nano features a smaller, thinner, lighter anodized aluminum enclosure, brighter display, and up to 24 hours battery life. Store up to 2,000 of your favorite songs.



I-01320018

RCA® 20-in CRT Television with Remote

Adjustable color warmth and preferred picture presets. 4:3 and 16:9 picture formats. Includes remote control.

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In case the particular gift you select is no longer available due to a model change, RJM Acquisitions LLC reserves the right to substitute a newer model of equal or greater value.

Please allow 4-6 weeks for delivery.

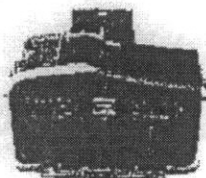
Offer void where prohibited by law.

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Please visit our website at www.toyota-awards.com/rjm to view the

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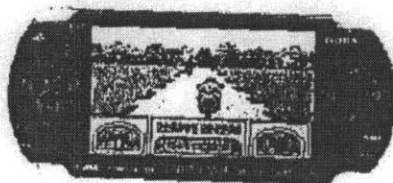
Juniper COLLECTION



J-05070052

Canon® PIXMA Office All-in-One Color Printer

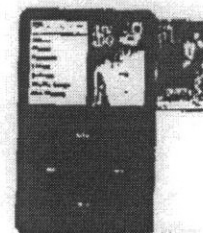
Copy and scan two-sided originals with Automatic Document Feeder. Fast prints up to 30 ppm black/24 ppm color and photo lab quality. Borderless 4 x 6-in photos in approximately 36 seconds. Super G3 fax with memory for up to 100 coded speed dials and 250 incoming faxes.



J-27080002

Sony® Playstation™ Portable Bundle

PSP provides the next level of portable entertainment featuring 32MB of system memory and dedicated PSP CPU. The 4.3-in LCD screen features a 16:9 widescreen aspect ratio and crisp, vivid graphics. Includes PSP core system, A/C adapter, battery, and one PSP game.



J-05060058

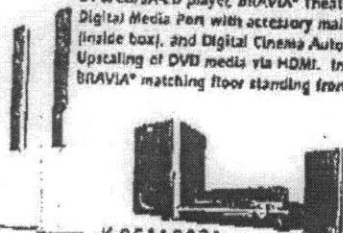
Apple® iPod® 80GB Black Player

New features include intuitive search function, gapless playback, and stores up to 19,000 songs.

Kerria COLLECTION

Sony® BRAVIA™ 1000W 5-Disc DVD Home Theater System

1000W total system power with 5-disc DVD/CD/SA-CD player, BRAVIA® Theater Sync, Digital Media Port with accessory multi-in coupon (inside box), and Digital Cinema Auto Calibration. Upscaling of DVD media via HDMI. Includes BRAVIA® matching floor standing front speakers.



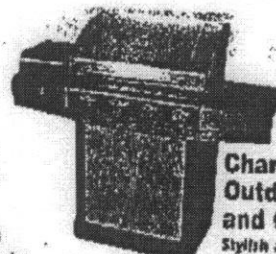
K-05110021



K-16080116

Movado® Men's Stainless Steel Two Tone Bracelet Watch

Movado® Corporate Exclusive watch with solid stainless steel bracelet, 18K gold plated bezel, mineral crystal, and black museum dial. The gold finish and accents are rich 18K micron. Water resistant to 90 ft.

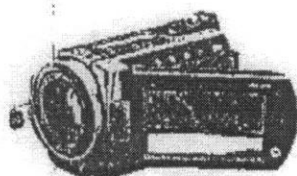


K-11210084

Char-Broil® Outdoor Grill and Griddle

Stylish appliance style cart with outdoor stove and Teflon® coated griddle. 859 sq in total cooking surface with porcelain cast iron cooking grates and griddle. Stainless steel lid and porcelain coated firebox. 48,000 BTU's.

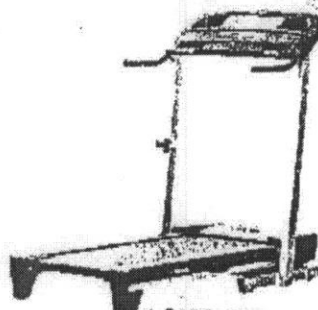
Lilac COLLECTION



L-05040009

Sony® 30GB Hard Disk Camcorder

1.0 Megapixel Advanced HAD™ CCD imager for exceptional resolution. 25x Optical/2000x Digital Zoom to bring the action up close from far away, and give you a clearer picture. 2.7-in Wide Hybrid Touch Panel SwivelScreen LCD Screen for the most clarity and high-resolution detail. 30GB Hard Disk Drive Storage to provide ample space for saving still shots and videos, and much more.



L-24200096

ProForm® 410 2.25-hp Motorized Treadmill

Features a 2.25-hp/1.25-CHP Machine Drive, with digital quickspeed to 10-MPH. Walking surface of 18 x 50-in, with ProTech Plus cushion. Green tint and 5 x 7-in workout matrix. Digital incline to 10 percent, and 4 preset workouts. ENG grip pulse, Coolaire workout fan, and 250-lb user capacity.



L-15020105

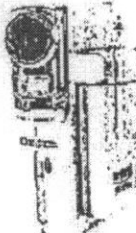
Calphalon® Cookware and Katana Knife Block Set

Cookware set has a hard-anodized exterior and nonstick interior, long handles that stay cool, and glass-and-stainless covers. Includes 8-in and 10-in omelet pans, 1.5-qt and 2.5-qt sauce pans with covers, and 8-qt stock pot with cover. Knife set is made from Japanese steel for ultimate edge retention and sharpness. Includes 3.5-in parer, 5-in santoku, 5.5-in serrated utility, 6-in utility, 8-in chef's, kitchen shears, 10-in diamond steel, and bamboo knife block.

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RJM

REWARDS

Geranium COLLECTION

G-02050077

Argus® Digital Video Camera

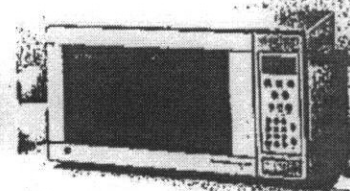
A versatile camera featuring 8x picture/4x video zoom, 1.5-in. LTPS display, 64Mb NAND flash internal memory, and SD card slot. 3.2 MP still image capture and 30-4ps video recording plus high-quality voice recording. USB connectivity plus webcam functionality. Includes photo editing software.



G-05110006

Audiovox® 300W DVD Home Theater System

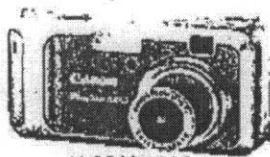
Includes a progressive scan DVD player, AM/FM tuner, and 5 magnetic shield surround speakers plus subwoofer. Built-in Dolby® Digital 5.1. Includes remote control.



G-01200003

G.E.® Stainless 1.1 cu ft 1100W Microwave

Convenient cooking controls, auto and time defrost, turntable, child lockout, and kitchen timer.

Hickory COLLECTION

H-02050016

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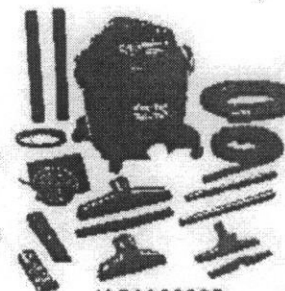
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H-26180005

Iris COLLECTION

I-05190218

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